IN THE

Supreme Court of the United States

October Term, 1975

No. 75-339

SUPREME COURT, U. S.
FILED
JAN 21 1976
MICHAEL RODAK, JR., CLERK

BUFFALO FORGE COMPANY, *Petitioner*,

v.

UNITED STEELWORKERS OF AMERICA, AFL-CIO; I. W. ABEL as International President; MITCHEL F. MAZUCA, Ind. and as District Director; JOHN GRUKA, Ind. and as International Representative of United Steelworkers of America, AFL-CIO;
LOCAL UNION No. 1874 of the United Steelworkers of America, AFL-CIO; VALENTINE F. ZIZZI, Ind. and as President; VALENTINE OLEJNICZAK, Ind. and as Vice President of Local Union No. 1874 of the United Steelworkers of America, AFL-CIO;
LOCAL UNION No. 3732 of the United Steelworkers of America, AFL-CIO; KERMIT HASELEY, Ind. and as President; and ALFRED LIGAMMARI, Ind. and as Vice President of Local Union No. 3732 of the United Steelworkers of America, AFL-CIO; *Respondents.*

On Writ of Certiorari to the United States Court of Appeals for the Second Circuit

MOTION BY RESPONDENT UNITED STEELWORKERS OF AMERICA, AFL-CIO, AND AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS, AS AMICUS CURIAE FOR LEAVE TO FILE JOINT BRIEF

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UNITED STEELWORKERS OF AMERICA, ET AL.,

Respondents.

MOTION FOR LEAVE TO FILE JOINT BRIEF

Respondent United Steelworkers of America, AFL-CIO (hereinafter referred to as "USWA" or "the Union") and the American Federation of Labor and Congress of Industrial Organizations (hereinafter referred to a. 'AFL-CIO") hereby move to file a joint brief and in support thereof show as follows:

AFL-CIO is a federation of 111 labor organizations, with a combined membership of 14 million. AFL-CIO is and for many years has been vitally concerned with the subject matter of this instant proceeding—namely, the relationship between the Norris-LaGuardia Act's prohibition on the issuance by federal courts of injunctions against strikes and the federal labor policy favoring arbitration which derives from §301(a) of the Labor-Management Relations Act.*

* Illustrative of its continuing interest in the development of the law with respect to the important issue under consideration here, AFL-CIO has filed *amicus* briefs in *Sinclair* v. *Atkinson,* 370 U.S. 195 (1962); and *Boys Markets* v. *Clerks Union,* 398 U.S. 235 (1970).

For that reason AFL-CIO has requested and obtained written consent from the parties to file an *amicus curiae* brief here.

USWA is the largest affiliate within the AFL-CIO. It is also the collective bargaining representative of the employees of the petitioner Buffalo Forge Company.

In the course of preparing their respective briefs, discussions between counsel for the AFL-CIO and USWA disclosed that both organizations would present a common position. Accordingly, AFL-CIO and USWA believed that their position could be most succinctly presented in one brief.

WHEREFORE, AFL-CIO and USWA jointly request that they be granted leave to file a single brief in this case.

Respectfully submitted,

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